

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss with prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41. No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Andy Dow Birchfield, Jr.
Andy Dow Birchfield, Jr.
Wesley Chadwick Cook
Beasley Allen Crow Methvin
Portis & Miles
P.O. Box 4160
Montgomery, AL 36103
(334) 269-2343
andy.birchfield@beasleyallen.com
Counsel for Plaintiffs

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com
Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A

Civil Action No.	Case Name	
2:14-cv-12321	Juanita L. Artman and Dennis Artman	vs. Ethicon, Inc.; Johnson & Johnson
2:12-cv-01052	Marty Babcock	vs. Ethicon, Inc.; Johnson & Johnson
2:14-cv-15557	Kimberly Borbely and Brian Borbely	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:12-cv-02973	Lydia Correa and Jose Correa	vs. Ethicon, Inc.; Johnson & Johnson
2:12-cv-01681	Jean E. Fleck	vs. Ethicon, Inc.; Johnson & Johnson
2:15-cv-03484	Dora Gallardo	vs. Ethicon, Inc.; Johnson & Johnson
2:14-cv-12510	Christine Godoy	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:12-cv-00783	Wendy Hagans	vs. Ethicon, Inc.; Johnson & Johnson
2:14-cv-28863	Donna Mae Hall and Tommy L. Hall	vs. Ethicon, Inc.; Johnson & Johnson
2:15-cv-11699	Doreen Hamlyn and John A. Seeber	vs. Ethicon, Inc.; Johnson & Johnson
2:13-cv-23133	Clara E. Hawks and Phillip A. Hawks	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-03906	Angela Henderson	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-04268	Rose Jackson and Marc Jackson	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:16-cv-02800	Elizabeth J. Kernodle and Bruce W. Kernodle	vs. Ethicon, Inc.; Johnson & Johnson
2:14-cv-00480	Esther B. Lomax	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-26981	Meza, Amanda	vs. Ethicon, Inc.; Johnson & Johnson
2:15-cv-05405	Greer Moore	vs. Ethicon, Inc.; Johnson & Johnson
2:15-cv-13103	Leann Morrison	vs. Ethicon, Inc.; Johnson & Johnson
2:15-cv-12325	Mary Ellen Mullins	vs. Ethicon, Inc.; Johnson & Johnson
2:13-cv-21924	Debbie Lynn Peake and Billy W. Peake	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:15-cv-06266	Beatrice W. Preston	vs. Ethicon, Inc.; Johnson & Johnson
2:15-cv-11703	Rebecca L. Scott and Gerald T. Scott	vs. Ethicon, Inc.; Johnson & Johnson
2:14-cv-12071	Suzanne D. Simas and Daniel J.	vs. Ethicon, Inc.; Johnson & Johnson;

	Simas	Ethicon, LLC
2:13-cv-13129	Linda L. Smith and George W. Smith	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-29249	Kim Vazquez and Joe Vazquez	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:13-cv-31563	Christine Wendt	vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:12-cv-01088	Rebecca Wheeler and David Wheeler	vs. Ethicon, Inc.; Johnson & Johnson